

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

DICKINSON BAY AREA BRANCH §  
NAACP, et al., §  
§  
*Plaintiffs*, §  
§  
v. § Civil Action No. 3:22-cv-117- JVB  
§  
GALVESTON COUNTY, TEXAS, et al., §  
§  
*Defendants*. §

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TERRY PETTEWAY, et al., §  
§  
*Plaintiffs*, §  
§  
v. § Civil Action No. 3:22-cv-57-JVB  
§ [Lead Consolidated Case]  
GALVESTON COUNTY, TEXAS, et al. §  
§  
*Defendants*. §

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UNITED STATES OF AMERICA, §  
§  
*Plaintiff*, §  
§  
v. § Civil Action No. 3:22-cv-93-JVB  
§  
GALVESTON COUNTY, TEXAS, et al. §  
§  
*Defendants*. §

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INDEX OF EXHIBITS

TO NAACP AND PETTEWAY PLAINTIFFS' JOINT MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS FROM DEFENDANTS

- Exhibit 1 Excerpts of January 17, 2023, Deposition of County Judge Mark Henry
- Exhibit 2 Excerpts of January 13, 2023, Expert Report of William S. Cooper
- Exhibit 3 Excerpts of November 12, 2021, Commissioners Court Special Session Transcript
- Exhibit 4 PDF of Plaintiffs' Excel Annotation of Defendants' Privilege Log
- Exhibit 5 January 20, 2021, Engagement Letter
- Exhibit 6 Tables of Select Privilege Assertions by Category
- Exhibit 7 Excerpts of January 5, 2023, Deposition of Commissioner Darrell Apffel
- Exhibit 8 December 17, 2021, Invoice of Thomas Bryan
- Exhibit 9 Excerpts of January 6, 2023, Deposition of Commissioner Joseph Giusti
- Exhibit 10 Excerpts of Defendants' First Supplemental and Amended Response to the United States' First Set of Interrogatories
- Exhibit 11 List of Documents identified by "Doc ID" in Defendants' privilege log that Plaintiffs contend are not protected Work Product
- Exhibit 12 List of Documents identified by "Doc ID" in Defendants' privilege log that Plaintiffs contend contain Boilerplate/Conclusory Assertions of Privilege
- Exhibit 13 List of Documents identified by "Doc ID" in Defendants' privilege log that Plaintiffs contend reflect legal advice was not the primary purpose of the communication
- Exhibit 14 List of Documents identified by "Doc ID" in Defendants' privilege log that Plaintiffs contend constitute underlying facts
- Exhibit 15 NAACP Plaintiffs' and Petteway Plaintiffs' Requests for Production of Documents
- Exhibit 16 List of Documents identified by "Doc ID" in Defendants' privilege log for which Plaintiffs have moved to Compel Production